

JAP:MTK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

FAITH JOSEPH,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

KYLER HARDIN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 29, 2015, within the Eastern District of New York and elsewhere, the defendant FAITH JOSEPH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about June 29, 2015, the defendant FAITH JOSEPH arrived at John F. Kennedy International Airport in Queens, New York ("JFK"), aboard Caribbean Airlines flight 550 originating from Georgetown, Guyana.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a tan “Michael Kors” pocketbook and a black “Xongda” carry-on suitcase. The defendant claimed ownership of both bags.

3. An inspection of the tan “Michael Kors” pocketbook revealed a hard substance lining the inside of both sides of the pocketbook. CBP officers also noticed the sides of the pocketbook were unusually thick and the pocketbook was heavy despite being emptied of all its contents.

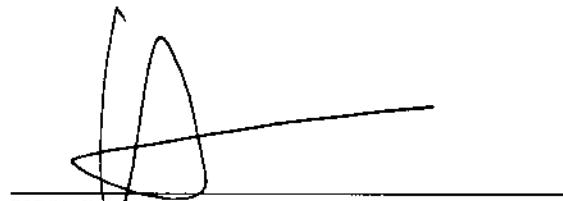
4. The defendant was escorted to a private search room for further inspection of her bags. CBP officers cut open the lining of the sides of the pocketbook and discovered two clear vacuum-packed plastic envelopes containing a white powdery substance. The substance inside the envelopes field-tested positive for the presence of cocaine. The defendant was then placed under arrest.

5. A subsequent search of the defendant’s “Xongda” suitcase revealed the presence of false bottom which contained an additional two envelopes containing a white powdery substance. The substance inside the envelopes field-tested positive for the presence of cocaine.

6. The total approximate gross weight of the cocaine recovered was 2106.5 grams.

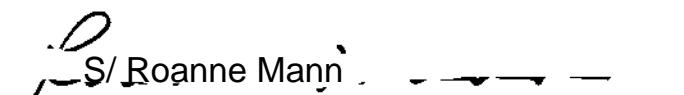
WHEREFORE, your deponent respectfully requests that the defendant FAITH JOSEPH be dealt with according to law.

Dated: Brooklyn, New York
June 29, 2015



KYLER HARDIN
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
29th day of June, 2015


S/ Roanne Mann
THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK